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September 30, 1997



Ex Parte

EX PARTE OR LATE FILED

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. - Room 222  
Washington, D.C. 20554

RECEIVED  
SEP 30 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No 97-181

Dear Mr. Caton:

Today, Frank Gumper, Ed Lowry, Bob Garner, and I, representing Bell Atlantic, met with Jim Schlichting, Susan Fox, Cheryl Leanza, and Rich Lerner, of the Common Carrier Bureau, regarding the item captioned above.

The attached material was used during the discussion, during which the Bell Atlantic representatives reiterated views already expressed by Bell Atlantic in its pleading in CC. Dkt. 97-181, and emphasized the difficulties associated with implementing by January 1, 1998, the Commission's rules regarding the application of SLCs to non-primary residential. During the meeting the Bell Atlantic representatives suggested alternatives that could be used to limit implementation problems.

Any questions on this matter should be directed to me at either the address or the telephone number shown above.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ken. Rust".

Attachment

cc: J. Schlichting  
S. Fox  
C. Leanza  
R. Lerner

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## **Definition of Primary Lines & Non-Primary Lines Bell Atlantic Proposal**

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- Bell Atlantic's proposed definition simplifies the identification.
  - » Base definition of residential primary lines on simplified approach which allows categorization using existing data. Proposed Bell Atlantic definition (9/25/97 Comments):
    - Residential subscriber line of a billing name customer, at a single service address, which is any of the following:
      - the only line provided to a residential customer (billing name) at that location;
      - the line designated by the billing name customer at the point of ordering service; or
      - where a billing name customer has not designated a line, the first line installed by the ILEC or any carrier reselling the ILEC's line.

# **Definition of Primary Lines & Non-Primary Lines Bell Atlantic Proposal**

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## **● Pros of Bell Atlantic's Definition**

- » Bell Atlantic's proposal provides a reasonable and understandable definition of primary and non-primary lines.
- » Will allow carriers to make initial determination based on existing records. Will avoid inconsistent treatment among customers.
- » By relying on existing billing data as the basis of the differentiation, there is no need to try to obtain additional information otherwise unrelated to phone service.
  - There would be no need to obtain any information concerning personal living arrangements.
  - This proposal avoids penalizing individuals who could be inappropriately classified as non-primary line customers with a broader measure.

## **Definition of Primary Lines & Non-Primary Lines Bell Atlantic Proposal**

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- **Concern over widespread customer gaming to avoid higher non-primary line charges is overstated.**
  - » Few residential customers will rearrange their accounts to avoid paying the higher non-primary line charges by billing additional lines under a different name.
    - Customers will face an administrative and financial requirement to rearrange accounts.
  - » Will avoid putting carriers in a position of obtaining information concerning personal living arrangements.

## **Definition of Primary Lines & Non-Primary Lines Problems of Location Definition**

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- **Definition based only on location discriminates against diverse living arrangements.**
  - » Unrelated roommates with separate phone lines treated as one household.
  - » Live-in relatives and other live-in tenants treated as one household.
  - » Tenants in subdivided homes treated as one household.
    - Common living arrangement in urban areas.

# Definition of Primary Lines & Non-Primary Lines

## Implementation Issues & Activities

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- **Identification of Primary & Non-Primary Accounts**

- » Identify all primary, and associated non-primary lines and accounts in billing systems. Requires systems work and will take about two months to complete after we receive the definition for primary and non-primary lines.

- **Methods Procedures & Training**

- » Develop new methods and procedures along with employee training to implement the definition the FCC adopts in its Order.
- » Over 12,000 employee contact personnel to train.

- **Systems Modifications**

- » Revise all provisioning and billing systems to accept the new service and billing identifiers for primary and non-primary lines (new SLC rate for a consumer non-primary line and PICC charges for both consumer primary and non-primary lines).